

NOW COME the Parties in the above-referenced litigation, and hereby submit this joint motion to extend the summary judgment opening brief deadline by 90-days, and extend the briefing schedule in accordance with the below listed deadlines. In support of this motion, the Parties state that Counsel for the Plaintiff is facing unanticipated health complications that have necessitated recent surgery and ongoing treatment, and which restrict his ability to brief and argue for summary judgment on behalf of his client. He is speaking with colleagues with whom he can associate to take over these responsibilities. The Parties propose the following schedule for summary judgment briefing accordingly:

<u>Event</u>	<u>Due Date</u>
Opening Briefs	October 28, 2022
Oppositions	December 2, 2022
Reply Briefs	December 16, 2022

WHEREFORE, the Parties to this matter request that the above be entered as a scheduling order of the court.

SONYA LARSON,
By her attorney,

/s/ Andrew D. Epstein

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By their attorneys,

/s/ Matthew H. Greene

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L.R. 7.1(a)(2) CERTIFICATION

I, Matthew H. Greene, certify that on July 22, 2022, I conferred with all counsel pursuant to Local Rule 7.1(a)(2), and the parties are in agreement with this motion.

/s/ Matthew H. Greene

Matthew H. Greene, Esq.

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing document has been served via email and/or first-class mail postage prepaid on all parties or their representatives in this action as listed below this 27th day of July, 2022:

Counsel for Plaintiff, Sonya Larson:

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/s/ Matthew H. Greene

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***Counsel for Defendants, Cohen Business Law Group, PC and
Jeffrey A. Cohen, Esquire***